

Message

From: Stalcup, Dana [Stalcup.Dana@epa.gov]
Sent: 5/27/2015 11:56:16 AM
To: Parker, Robert [Parker.Robert@epa.gov]; Deitz, Randy [Deitz.Randy@epa.gov]; Jeng, Terry [Jeng.Terry@epa.gov]; Chalfant, Mark [Chalfant.Mark@epa.gov]
CC: Ammon, Doug [Ammon.Doug@epa.gov]; Snyder, Raquel [Snyder.Raquel@epa.gov]; Janifer, Pamela [Janifer.Pamela@epa.gov]; Myers, Robert [Myers.Robert@epa.gov]; Wendel, Jennifer [Wendel.Jennifer@epa.gov]
Subject: RE: CFAC presentation to Montana West Economic Development

Sounds good folks. Let us know if you need anything else from us. - Dana

Dana Stalcup
Director, Assessment and Remediation Division
OSWER/Office of Superfund Remediation and Technology Innovation (OSRTI)
Desk - 703-603-8702
Cell - 202-309-5473

-----Original Message-----

From: Parker, Robert
Sent: Tuesday, May 26, 2015 6:09 PM
To: Deitz, Randy; Jeng, Terry; Stalcup, Dana; Chalfant, Mark
Cc: Ammon, Doug; Snyder, Raquel; Janifer, Pamela; Myers, Robert; Wendel, Jennifer
Subject: RE: CFAC presentation to Montana West Economic Development

Thanks Randy. I appreciate it.

Rob

Rob Parker, PE
Site Assessment Manager
Environmental Engineer
US EPA, Region 8, Denver
(303) 312-6664

-----Original Message-----

From: Deitz, Randy
Sent: Tuesday, May 26, 2015 4:08 PM
To: Parker, Robert; Jeng, Terry; Stalcup, Dana; Chalfant, Mark
Cc: Ammon, Doug; Snyder, Raquel; Janifer, Pamela; Myers, Robert; Wendel, Jennifer
Subject: RE: CFAC presentation to Montana West Economic Development

That should be fine. It is public information and describes why we proposed the site on the NPL, notwithstanding the PRP claims that there is no risk posed by the site.

Randy Deitz
Attorney Advisor
Office of Solid Waste and Emergency Response
(202) 566-0197

-----Original Message-----

From: Parker, Robert
Sent: Tuesday, May 26, 2015 5:51 PM
To: Deitz, Randy; Jeng, Terry; Stalcup, Dana; Chalfant, Mark
Cc: Ammon, Doug; Snyder, Raquel; Janifer, Pamela; Myers, Robert; Wendel, Jennifer
Subject: RE: CFAC presentation to Montana West Economic Development

AC Communication - FOIA Exempt

Thanks Randy -

Based on your feedback below, it doesn't sound as if there is a procedural issue with responding to the Senator's staff with the listing fact sheet (<http://www.epa.gov/superfund/sites/npl/nar1904.htm>) or a high level response indicating our position that the site is eligible for the NPL. Is that correct?

Thanks,
Rob

Rob Parker, PE
Site Assessment Manager
Environmental Engineer
US EPA, Region 8, Denver
(303) 312-6664

-----Original Message-----

From: Deitz, Randy
Sent: Tuesday, May 26, 2015 2:22 PM
To: Parker, Robert; Jeng, Terry; Stalcup, Dana; Chalfant, Mark
Cc: Ammon, Doug; Snyder, Raquel; Janifer, Pamela; Myers, Robert; Wendel, Jennifer
Subject: RE: CFAC presentation to Montana West Economic Development

I will defer to OSRTI and R-8 on whether the PRP background should be considered a formal comment. I am more concerned with giving our side of the listing issue to Senator Tester's office and/or the Montana West Economic Development Board. I am thinking we could use text from the NPL site proposal fact sheet (see first paragraph below) and facts/figures from our Superfund web site on benefits of NPL listing and cleanup (following paragraphs below)

ANACONDA ALUMINUM CO COLUMBIA - FALLS REDUCTION PLANT The ground water and percolation ponds at the site are contaminated with cyanide and fluoride, as well as other metals. Contaminants have been released into ground water beneath the site, as well as the Flathead River and Cedar Creek (both located directly adjacent to the site). Cyanide has contaminated two nearby residential wells. Other homes within the same neighborhood have domestic wells for their water source which may potentially be contaminated. impacted. Cyanide and metals, including fluoride and manganese are contaminating the Flathead River. The Flathead River is a fishery that supports a variety of fish, including the federally-designated threatened bull trout, the federally-designated sensitive westslope cutthroat trout and other species that are harvested for human consumption.

SUPERFUND BENEFITS

Recent academic research, from the study Superfund Cleanups and Infant Health, demonstrated that investment in Superfund cleanups reduces the incidence of birth defects for those living within 2,000 meters (or 2,187 yards) of a site.

Another academic study found that residential property values within three miles of Superfund sites increased 18.6-24.5 percent when sites were cleaned up and deleted from the National Priorities List.

In fiscal year 2014 alone, 450 of the 850 sites where some kind of reuse is occurring indicate that the ongoing operations of approximately 3,470 businesses are generating annual sales over \$65.1 billion and employing over 89,000 people, who are earning a combined income of \$6.0 billion.

Randy Deitz
Attorney Advisor
Office of Solid Waste and Emergency Response
(202) 566-0197

-----Original Message-----

From: Parker, Robert
Sent: Tuesday, May 26, 2015 3:59 PM
To: Jeng, Terry; Deitz, Randy; Stalcup, Dana; Chalfant, Mark
Cc: Ammon, Doug; Snyder, Raquel; Janifer, Pamela; Myers, Robert; Wendel, Jennifer
Subject: RE: CFAC presentation to Montana West Economic Development

A/C Communication - Deliberative Process

Hi Terry and Randy -

The Region does not think it's appropriate to treat this fact sheet that we believe was created by CFAC as a comment for the following reasons:

1. The document wasn't addressed or submitted to EPA by its originator for inclusion in the docket.
2. The document was not conveyed to EPA by the third party with any indication it should be treated as a comment for inclusion in the docket.
3. The Region anticipates that the originator of this informal document created for a different audience (Montana West Economic Development Board of Directors) will submit formal comments to EPA prior to the end of the comment period, and including both documents in the docket may introduce confusion in the record.

In regard to the response to Sen Tester's office, the Region is seeking guidance on what HQ thinks is an appropriate level of detail. We do not think it's appropriate at this time to respond line by line to this document during the comment period, but we would like to be responsive at a higher level. Is there

is a procedural issue with providing a very high level response to the Senator's staff? Something on the order of: "Based on the data collected at the site, EPA believes the site is eligible for the NPL. EPA will respond to all comments submitted to EPA regarding the proposed NPL listing, including any comments submitted to EPA by the Potentially Responsible Parties."

Thanks,
Rob

Rob Parker, PE
Site Assessment Manager
Environmental Engineer
US EPA, Region 8, Denver
(303) 312-6664

-----Original Message-----

From: Jeng, Terry
Sent: Tuesday, May 26, 2015 12:43 PM
To: Deitz, Randy; Stalcup, Dana
Cc: Ammon, Doug; Snyder, Raquel; Janifer, Pamela; Parker, Robert; Myers, Robert; Wendel, Jennifer
Subject: RE: CFAC presentation to Montana West Economic Development

This is a comment from the PRP forwarded by Senator Tester's office. The comment period for this site is still open. Our response letter to Senator Tester should be somewhat similar to the response to Congressman Zinke - thanks for your letter; we have placed the comment in the public docket; we will consider these comments as well as all other comments received before we make a final decision regarding the listing of the site; listing need not impede ongoing negotiations.....

Then we can do a full response to the comments in the support document when/if we add the site to the NPL.

Terry Jeng
Office of Superfund Remediation and Technology Innovation
703-603-8852

-----Original Message-----

From: Deitz, Randy
Sent: Tuesday, May 26, 2015 1:24 PM
To: Stalcup, Dana
Cc: Ammon, Doug; Jeng, Terry; Snyder, Raquel; Janifer, Pamela
Subject: FW: CFAC presentation to Montana West Economic Development

R-8 has reached out to us for help responding to a background paper developed by the PRP at the Columbia Falls Aluminium Company site in Montana that we proposed to the NPL. The paper was sent to R-8 by Senator Tester's office and they are asking for EPA comments/feedback. The paper advocates the PRP's view that the site is not an appropriate candidate for listing on the NPL; including that purportedly there are no hazardous substances being released from the site that pose a risk to human health and the environment and that NPL listing will undermine chances for economic redevelopment. EPA needs to get back to Senator Tester's office with a response/feedback. The R-8 POC who reached out to headquarters is Rob Parker, Site Assessment Manager in R-8 (303) 312-6664. I am also copying OCIR since this initially came in as a congressional request. Thank you.

Randy Deitz
Attorney Advisor
Office of Solid Waste and Emergency Response
(202) 566-0197

-----Original Message-----

From: Parker, Robert
Sent: Tuesday, May 26, 2015 12:14 PM
To: Cohen, Nancy; Bassler, Rachel
Cc: Chalfant, Mark; Russo, Rebecca
Subject: FW: CFAC presentation to Montana West Economic Development

Hi Nancy and Rachel,

We received the attached document from a Senator Tester (Montana) Field Director, Virginia Burns-Loranger. The document/fact sheet was created by a Superfund PRP, and Virginia is interested in EPA's

thoughts regarding the presented material. We are hopeful to find a contact within OSWER who can assist us with the response.

This is in regard to the Anaconda Aluminum Co site near Columbia Falls, Montana (known locally as the Columbia Falls Aluminum Company). EPA has proposed the site to the NPL which is currently in a public comment period. We would like to coordinate any response with HQ, as proposing the site was a HQ rulemaking. Since we're in the public comment period, we are trying to avoid the perception that EPA is influencing public comments, yet we want to be responsive to the Senator's office.

Our site attorney, Mark Chalfant, reached out to OECA's Nick Conger, who provided your contact information. Do you know of an appropriate contact within OSWER who can assist us with this response?

Thank you,
Rob

Rob Parker, PE
Site Assessment Manager
Environmental Engineer
US EPA, Region 8, Denver
(303) 312-6664

-----Original Message-----

From: Loranger, Virginia (Tester) [mailto:Virginia_Loranger@tester.senate.gov]
Sent: Thursday, May 21, 2015 2:11 PM
To: Tracy Stone-Manning (tstone-manning@mt.gov); Parker, Robert
Cc: Campbell, Chad (Tester); Laslovich, Dylan (Tester); Swanson, Dayna (Tester); Wise, James (Tester); DiLuccia, Janelle (Tester); Nylund, Erik (Tester)
Subject: CFAC presentation to Montana West Economic Development

Tracy and Rob,

I have been forwarded a copy of a presentation made to the Montana West Economic Development Board of Directors asking them to not support a national priority listing for CFAC. Haley Beaudry and Steve Wright (CFAC employees) made the presentation.

I would appreciate your insight on their comments. At a recent meeting they organized called the Community Liaison Panel, Cheryl Driscoll, Glencore executive stated "CFAC is responsible for the cleanup and Glencore is here to help."

Virginia
Flathead Regional Field Director
U.S. Senator Jon Tester
8 Third St E. - Kalispell, MT 59901 ☐please note new address
(406) 257-3859 direct line
(406) 871-6477 cell
(406) 257-3974 fax
virginia_burns-loranger@tester.senate.gov